

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,                     :  
  
  Plaintiff                     :  
  
  v.                                 : CIVIL ACTION NO.  
  
TRENA L. PELHAM, M.D.,                     :  
  
  Defendant                     :

**COMPLAINT**

The United States of America, by its Attorneys, Patrick L. Meehan, United States Attorney in and for the Eastern District of Pennsylvania, and Virginia R. Powel, Assistant United States Attorney for said District, complains of the defendant as follows:

1. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §1345 in that the plaintiff is the United States of America on behalf of its agency, the **DEPARTMENT OF HEALTH AND HUMAN SERVICES**.

2. Venue is properly set pursuant to 28 U.S.C. §1391 in that the plaintiff is complaining of **TRENA L. PELHAM, M.D.**, residing at 5034 Greene Street, Philadelphia, PA 19144, a location within this District.

3. Defendant applied for and received National Health Service Corps Scholarship Loans, which loans were insured by the Department of Health and Human Services pursuant to 42 U.S.C. 294t-y, redesignated as amended 42 U.S.C. 254I, m-q.

4. Defendant, **TRENA L. PELHAM, M.D.**, is indebted to plaintiff in the principal amount of \$29,181.00 plus interest through October 15, 2004, in the amount of \$22,511.08, as set forth in the Certificate of Indebtedness attached hereto as Exhibit "A". Interest continues to accrue at the approximate rate of 13.625%

5. Defendant has failed to pay the aforesaid amount although demand has been made for payment.

WHEREFORE, plaintiff demands judgment against the defendant, **TRENA L. PELHAM, M.D.**, in the amount of \$51,692.08, plus additional prejudgment interest accruing from October 15, 2004, until judgment as set forth in paragraph (4) above, plus interest on the Judgment at the legal rate, plus costs and other proper relief until paid in full.

Respectfully submitted,

**PATRICK L. MEEHAN**  
United States Attorney

---

**VIRGINIA R. POWEL**  
Assistant United States Attorney